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STRATEGIC CONSULTING LLC
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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January 14, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ex Parte Filing
CC Docket No. 99-200

Dear Ms. Salas:

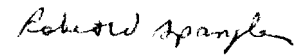
On January 13, 2000, Richard A. Karre and Tina S. Pyle of MediaOne Group and Robert W. Spangler of Wallman Strategic Consulting, LLC met with Yog R. Varma, Deputy Chief of the Common Carrier Bureau, and L. Charles Keller and Diane Griffin Harmon of the Network Services Division, concerning the referenced proceeding. The MediaOne representatives described the company's operation as a competitive local exchange carrier and the adverse impact that the lack of numbering resources is having on its ability to provide service in California, Massachusetts and New Hampshire.

The details of MediaOne's presentation are contained in the enclosed seven-page document, which was distributed at the meeting. Also enclosed is a copy of a study prepared by NeuStar concerning the availability of numbers in the 310 NPA in California. That chart also was distributed at the January 12 meeting.

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In accordance with the Commission's rules, the original and one copy of this letter and its enclosures are being filed with the Office of the Secretary for inclusion in the public record.

Sincerely,



Robert W. Spangler

Enclosures

cc: Yog R. Varma (w/o enclosure)
 L. Charles Keller "
 Diane Griffin Harmon "



Digital Telephone Services

Creating Consumer Choice In Local Telecommunications:

MediaOne's Urgent Need for Numbering Resources

January 13, 2000

FCC CC Docket No. 99-200

Agenda

- Updates to MediaOne's numbering crisis:
 - California
 - Massachusetts
 - New Hampshire

California

- MediaOne planned to offer residential local telephony in four Los Angeles communities (310 NPA) in July 1999.
 - In these communities, MediaOne's telephony-ready network passes 44,000 homes.
 - MediaOne obtained the necessary NXX codes in the to-be-implemented 424 overlay.
 - Suspension of the overlay left MediaOne without codes and unable to offer service.
- MediaOne has participated in all monthly lotteries for the 310 NPA since the suspension of the 424 overlay, but has not received a single code.

California (Continued)

- MediaOne is pursuing “self help” methods to obtain numbering resources.
- MediaOne is supporting an aggressive implementation of thousands-block numbering pooling.
 - However, pooling is not effective in NPAs that are exhausted.
- Six months after its planned launch, MediaOne is still not providing local telephony services to these customers -- due solely to a lack of numbering resources.

Massachusetts

- In the first half of 2000, MediaOne requires an additional 23 codes, and it will most likely need that many again in the second half of the year.
- Despite regular participation in the monthly lottery, MediaOne continues to face severe number shortages.
- On 12/16/99, MediaOne sent a letter to the Massachusetts DTE requesting additional NXX codes outside of the current rationing plan.
 - Due to the critical numbering shortage in Massachusetts, MediaOne limited its request to only 8 NXXs for activation in early 2000.

Massachusetts (Continued)

- The Massachusetts DTE has “docketed” MediaOne’s request, and plans to issue a decision by the end of January.
- Similar to its efforts in California, MediaOne is pursuing “self help” methods and is eager to participate in thousands-block pooling trials.
 - The DTE has not yet set an implementation date for pooling.
- MediaOne’s plans to serve numerous Massachusetts communities will most likely be delayed -- strictly due to a lack of numbering resources.

New Hampshire

- MediaOne also faces a severe lack of numbering resources in New Hampshire.
 - In the first quarter of this year, MediaOne will likely be unable to serve 11 communities -- or 32,000 homes -- simply due to the code shortage.
- The New Hampshire PUC has recently received the authority to implement a number pooling trial, but has not yet set a date.
- Area code relief was conditioned on implementation of unassigned number porting -- which was denied by the FCC.

310 Combined Forecast

Non - Contamination
and Contamination

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA
1			*****	***	*****	***	****2000****	***	*****	***	*****	****		*****	***	****2001****	***				*****	***					
2	310 Rate Centers	Forecast		Jeopardy		Jeopardy		Jeopardy		Jeopardy		# of Codes			Jeopardy		Jeopardy		Jeopardy		# of Codes	18 Mo Total	Donations	New Code	Code+Blks=	# Assigned 00	# Assigned 01
3	AVALON		1st Qtr		2nd Qtr		3rd Qtr		4th Qtr		Total 2000			1st Qtr		2nd Qtr		3rd Qtr		01 Totals							
4	BEVERLY HILLS		5	J	1	J	2	J	3	J	11	1		1	J	2	J	4	J	7	2	18	2	0	2	0	
5	CMTN CMTN		8		6		18		20	J	52	1		19	J	16	J	13	J	48	5	100	49	0	49	0	
6	CMTN GRDN		12		5		11	J	11	J	39	2		14	J	11	J	9	J	34	6	73	20	0	20	0	
7	CULVER CITY		6		5		14		11		36	0		13		12		8		33	0	69	69	0	69	0	
8	EL SEGUNDO		8		3		9		10		30	0		13	J	11	J	10	J	34	3	64	37	0	37	0	
9	HAWTHORNE		9		10		14		18	J	51	2		19	J	17	J	11	J	47	6	98	39	0	39	0	
10	INGLEWOOD		8		4		15		11	J	38	1		10	J	16	J	10	J	36	4	74	35	0	35	0	
11	LOMITA		6		4		10		13		33	0		8		12	J	7	J	27	2	60	49	0	49	0	
12	MALIBU		7		3		10	J	8	J	28	2		8	J	11	J	6	J	25	4	53	13	0	13	0	
13	REDONDO		7		3		5		4		19	0		4		4		6		14	0	33	34	0	34	0	
14	SNMN MRVS		13		11		22		22	J	68	2		23	J	23	J	21	J	67	8	135	49	0	49	0	
15	SNMN SNMN		30		16	J	28	J	32	J	106	7		39	J	38	J	33	J	110	8	216	40	0	40	0	
16	SAN PEDRO		10		3		9		10		32	0		9	J	12	J	8	J	29	3	61	37	0	37	0	
17	TORRANCE		9		4		13		9		35	0		11		10		10	J	31	1	66	61	0	61	0	
18	W ANGELES		15		15		26	J	36	J	92	6		41	J	39	J	35	J	115	8	207	38	0	38	0	
19		Total 2000 =	166		98		220		232		716	24		248		253		211		712	64	1428	634	0	634	0	
20			1st Qtr		2nd Qtr		3rd Qtr		4th Qtr		Total 2000			1st Qtr		2nd Qtr				Total 2001		18 Mo	Total		Total		
21																					Block	Donations	Donation +				
22																					Total	Total	Code open				
23																							(in Blks)				
24																											
25	Forecasted Blks 2000	=	716	=				Forecast Total		=	1428									Codes			Codes				
26	Total Donations (Blks)	=	634	=			18 Month	Donation Total		=	634									Needed	40		Opened				
27	Difference (Blks) 2000	=	-82	=				Difference total		=	794									in 2001			Date =	0			
28	Codes needed in 00	=	24	=				Codes Needed		=	64																
29																											
30																											
31	310 NumberPooling began = 3-18-00																										
32	Prepared By --	Kevin Gatchell																									
33	V-925-363-8742	Pooling Administrator																									
34	F-925-363-8761																										
35	Email kevin.gatchell@neustar.com																										
36																											

NEUSTAR

310 Combined Forecast

Non-Contamination only
(For Discussion only)
California Pooling Task Force
January 6, 2000

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA
1			*****	***	*****	***	*****2000*****	***	*****	***	*****	****		*****	***	*****2001*****	***			*****	***						
2	310 Rate Centers	Forecast		Jeopardy		Jeopardy		Jeopardy		Jeopardy		# of Codes							Jeopardy		Jeopardy						
3			1st Qtr		2nd Qtr		3rd Qtr		4th Qtr		Total 2000				1st Qtr		2nd Qtr		3rd Qtr		01 Totals		# of Codes		18 Mo Total		
4	AVALON		5	J	1	J	2	J	3	J	11	1			1	J	2	J	4	J	7		2	18	1	0	
5	BEVERLY HILLS		8		6		18	J	20	J	52	3			19	J	16	J	13	J	48		7	100	31	0	
6	CMTN CMTN		12		5	J	11	J	11	J	39	3			14	J	11	J	9	J	34		6	73	14	0	
7	CMTN GRDN		6		5		14		11		36	0			13	J	12	J	8	J	33		3	69	44	0	
8	CULVER CITY		8		3		9		10	J	30	1			13	J	11	J	10	J	34		4	64	27	0	
9	EL SEGUNDO		9		10		14	J	18	J	51	3			19	J	17	J	11	J	47		7	98	28	0	
10	HAWTHORNE		8		4		15	J	11	J	38	2			10	J	16	J	10	J	36		5	74	24	0	
11	INGLEWOOD		6		4		10		13	J	33	1			8	J	12	J	7	J	27		3	60	31	0	
12	LOMITA		7		3		10	J	8	J	28	2			8	J	11	J	6	J	25		4	53	12	0	
13	MALIBU		7		3		5		4		19	0			4		4		6	J	14		1	33	29	0	
14	REDONDO		13		5		14		14		46	0			16	J	19	J	20	J	55		5	101	51	0	
15	SNMN MRVS		13		11		22	J	22	J	68	3			23	J	23	J	21	J	67		8	135	38	0	
16	SNMN SNMN		30	J	16	J	28	J	32	J	106	8			39	J	38	J	33	J	110		8	216	25	0	
17	SAN PEDRO		10		3		9		10	J	32	1			9	J	12	J	8	J	29		4	61	29	0	
18	TORRANCE		9		4		13		9		35	0			11	J	10	J	10	J	31		3	66	39	0	
19	W ANGELES		15		15	J	26	J	36	J	92	7			41	J	39	J	35	J	115		8	207	27	0	
20		Total 2000 =	166		98		220		232		716	35			248		253		211		712		78	1428	450	0	
21			1st Qtr		2nd Qtr		3rd Qtr		4th Qtr		Total 2000				1st Qtr		2nd Qtr				Total 2001			18 Mo		Total	
22																						Block		Donations		Donation +	
23																						Total				Code open	
24																										(in Blks)	
25	Forecasted Blks 2000	=	716	=					Forecast Total	=	1428										Codes						
26	Total Donations (Blks)	=	450	=			18 Month		Donation Total	=	450										Needed	43					
27	Difference (Blks) 2000	=	-266	=					Difference total	=	978										in 2001						
28	Codes needed in 00	=	35	=					Codes Needed	=	78																
29																											
30																											
31	310 Number Pooling began =	3-18-00																									
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California Pooling Task Force
January 6, 2000

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